

Board of Certification of Operators of Wastewater Treatment Facilities

August 2013



**Response to comments received during public comment for
proposed revisions to the**

Rules and Regulations for Wastewater Treatment Facility Operators

The following submitted comments in writing via email.

Mr. Peter Connell
Mr. Michael Spring

RI Resource Recovery Corporation
Narragansett Bay Commission

The Board received no other comments verbally or in writing at the August 6, 2013 public hearing held at the RI DEM in Providence. Nor did it receive any other direct written correspondence during the public comment period between July 2, 2013 and August 13, 2013. Copies of all comments are on file and available for public review at the RI Department of Environmental Management, 235 Promenade Street, Providence, RI 02908.

The following responses by the Board of Certification of Operators of Wastewater Treatment Facilities address the submitted individual comments.

Comment 1:

I like the new proposed changes for 20 hours of required training. However, I think that everyone who has a license should do some type of training. In my case, I've been taking advantage of the training that the NWPCA has been offering, which has been very good in my opinion. Unfortunately, I had to miss yesterday's training.

In the second letter under the second bullet, you mention maintenance and laboratory professions, but aren't most treatment facilities also include the collections system? Just a thought.

Response:

This comment has two parts.

In response to the first part: The Board appreciates the desire of wastewater professionals who seek the advancement of their skills and knowledge. At the same time, the Board expects that all wastewater professionals are remaining up to date with the necessary information required for the discharge of their professional duties and that such training is provided at all wastewater treatment facilities. It is the Board's opinion that the proposed voluntary "above-and-beyond" training licensure levels (see proposed Rule 13(B)(4)) represents a significant improvement from the existing regulations. Furthermore, it is the opinion of the Board that this addition encourages motivated operators who will seek to advance in their careers to take training beyond the subjects needed for their positions and facilities. As such, the Board will at this time make no revisions to the current draft.

In response to the second part of this comment: The Board does not have the authority to certify collection systems personnel. While their work is related to the overall mission of protecting the environment and human populations from the effects of raw sewage, collection system personnel provide a unique function that is outside the scope of treatment plant operations. As such, the Board will make no revisions to the current draft.

Comment 2:

[This comment was received as a copy to a general email made the Narragansett Water Pollution Control Association.]

I'm very disappointed in the new Operations regs. Other states such as Massachusetts, Connecticut, New Hampshire, Maine and New York recognize how valuable there maintenance and Lab staff are to the waste water industry. They value and look at the maintenance and lab staff as fellow operators and allow them to apply and sit for the same level licenses. Why do our state regulators want to restrict the learning potential of our maintenance or laboratory personal where you should be trying to expand their potential rather than hold them down. Operations relies on the maintenance staff to keep equipment operating and well maintained to protect the plants permit compliance. The operators staff also rely on the lab for accurate laboratory data too make accurate process adjustments. It seems our regulators are stopping people from reaching their potential. As the Baby boomer generation is getting ready to retire the next generation is finding it harder to advance in the wastewater field without obtaining the higher licenses. The regulators are decreasing the pool of well-rounded (operationally, mechanical knowledge and laboratory knowledge) potential candidates for assistant superintendents and superintendents that well be needed in the years to come.

Response:

While the Board of Certification of Operators of Wastewater Treatment Facilities values and appreciates the work that is routinely performed by all professions that work to achieve the missions of wastewater treatment facilities, the Board is charged with licensing only the profession of wastewater operations. In the past, the Board had agreed to license mechanics and laboratory technicians up to Grade 2 because such functions can be performed by operators, especially in many smaller plants. The Board does not consider this upper limit of Grade 2 to be a restriction on the professional development of maintenance or laboratory professions, which provide unique functions at wastewater treatment facilities that are outside of (even if in relation to) plant operations. It should be noted that the Board encourages wastewater treatment managers to allow staff at all levels to blend operations and maintenance duties and (where possible) laboratory functions. In this way the profession itself will assist in the development of well-rounded individuals who are versed in both operations and maintenance. Per the above, the Board will make no revisions to the current draft.